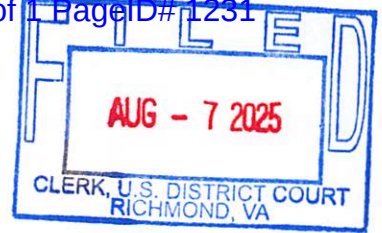


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division



KEVIN JOHNSON,

Plaintiff,

v. Case No. 3:24-cv-00080-HEH

VIRGINIA DEPARTMENT OF CORRECTIONS, et al.,

Defendants.

PLAINTIFF'S SUPPLEMENTAL MOTION TO ENFORCE  
SETTLEMENT AGREEMENT

Plaintiff pro se hereby moves to enforce this court's ordered settlement Agreement entered by the parties herein on December 4, 2024, because:

1. Plaintiff moved to enforce the December 4, 2024 Settlement Agreement (SA) herein on June 2, 2025 in his Motion and Request For Emergency Hearing on Defendants' Breach of Settlement Agreement (ECF # 98), which he hereby maintains on the grounds stated therein of defendants' breach of the SA.
2. Defendants and their agents in the South Carolina Department of Corrections (SCDC) have further breached the SA as of July 18, 2025 when they revoked his single cell general population status in violation of T15 of the SA and threw him into torturous solitary confinement housing. See plaintiff's verified facts and legal authorities and argument in support of his Motion for Contempt filed herewith.<sup>1</sup>

THEREFORE this court should grant plaintiff the relief sought by him in ECF # 98 at the soonest opportunity of returning him to Virginia Department of Corrections housing in general population at Keen Mountain Correctional Center and in single cell housing or in such housing in the VDOC's central or eastern region as sought in his Motion for Contempt herewith, and any further relief deemed fair and just.

Respectfully submitted,

Kevin Johnson  
Plaintiff pro se

Reply to: Kevin Johnson, No. 397279  
Perry Correctional Institution  
430 Oaklawn Rd.  
Pelzer, SC 29669

<sup>1</sup> Plaintiff's motion herein and ECF # 98 are made pursuant to this court's auxiliary jurisdiction under Kokkonen v. Guardian Life Ins., 511 U.S. 375 (1994).